

ISMAIL AMIN, ESQ. (NV Bar No. 9343)  
 iamin@aminlawgroup.com  
 LAWRENCE KULP, ESQ. (NV Bar No. 7411)  
 lkulp@aminlawgroup.com  
**THE AMIN LAW GROUP, NV., LTD.**  
 3960 Howard Hughes Parkway, Suite 500  
 Las Vegas, Nevada 89169  
 Telephone: (702) 990-3583  
 Facsimile: (702) 990-3501  
*Attorneys for Plaintiff, CC.MEXICANO.US, LLC*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

\_\_\_\_\_  
 CC.MEXICANO.US, LLC,  
 a Nevada limited liability company,  
  
 Plaintiff,

vs.

\_\_\_\_\_  
 AERO II AVIATION, INC., a Delaware  
 Corporation; GEORGE W. BLOOD, an  
 individual; STEPHEN L. CRITTENDEN, an  
 individual; DOES 1-20, inclusive; and ROE  
 ENTITIES 1-20, inclusive,  
  
 Defendants.

) Case No. 2-14-v-00108-JCM-NJK

) **STIPULATION FOR EXTENSION**  
 ) **OF TIME TO FILE PROPOSED**  
 ) **JOINT PRETRIAL ORDER**

) *[SECOND REQUEST]*

**IT IS HEREBY STIPULATED** by and between Plaintiff, CC.MEXICANO.US, LLC,  
 and Defendants, AERO II AVIATION, INC., and GEORGE W. BLOOD, by and through their  
 respective counsel of record, that the parties may have a one-week extension of time to file  
 their proposed joint pre-trial order, currently due on or before January 29, 2015. Good cause  
 exists for approval of this stipulation, as set forth below:

1           1.       On January 15, 2016, Magistrate Judge Nancy J. Koppe entered an order  
2 extending the time for the parties to submit their proposed joint pretrial order. The undersigned  
3 counsel believe that one last extension of time, for one week, would serve the interests of  
4 expediency and conservation of the parties' and the Court's resources.

5  
6           2.       The joint pretrial order is a very important document, as it binds the parties with  
7 respect to the conduct of trial, the issues to be tried, and the evidence to be presented. As  
8 Magistrate Judge Koppe has pointed out, the joint pretrial order may be amended "as  
9 necessary," but ultimately the determination of whether it is "necessary" lies with the Court.  
10 Therefore, the undersigned counsel are strongly motivated to "get it right" the first time.  
11 Getting it right the first time may save the parties the time and trouble of preparing an amended  
12 order and avoid the Court's having to consider it.

13  
14           3.       A draft of the proposed joint pretrial order has been nearly completed, and the  
15 undersigned counsel believed, up until yesterday, that it would be ready for filing today. As  
16 various matters relating to the facts, as well as stipulations or objections regarding the exhibits  
17 to be offered, were fleshed out, it became clear that the undersigned counsel had too many  
18 disagreement to resolve before putting their signatures on a stipulation. Moreover, counsel for  
19 the stipulating defendants states that he must confer with his clients in this regard.

20  
21           4.       Counsel for the stipulating defendants also states that the reason a one-week  
22 extension is needed, rather than just a day or two, is that he will be traveling out-of-town on  
23 Monday and Tuesday of next week and will have little availability during that time to give this  
24 matter attention.  
25  
26  
27  
28

5. Plaintiff's counsel represents that efforts to include Defendant Stephen L. Crittenden in the process of drafting the joint pretrial order have, thus far, proven futile. Nonetheless, counsel may have better luck if given another week to continue such efforts.

6. Finally, the undersigned counsel submit that this very short extension of time will not cause any delay in going to trial. Trial counsel have very busy trial schedules this year and it appears that they cannot find a time frame where both can be available for a two-week jury trial until October. In that light, a one-week extension of time to file a proposed joint pretrial order would seem insignificant for either the Court or the parties.

WHEREFORE, the undersigned counsel agree that the parties may file their proposed joint pretrial order by no later than Friday, February 5, 2016, and request that the Court enter an order accordingly.

**THE AMIN LAW GROUP, NV., LTD.**

By: // Lawrence Kulp //  
LAWRENCE KULP, ESQ.  
*Attorneys for Plaintiff*

Dated: January 29, 2016

**GARMAN TURNER GORDON LLP**

By: // Eric R. Olsen //  
ERIC R. OLSEN, ESQ.  
*Attorneys for Defendants,  
Aero II Aviation, Inc., and  
George W. Blood*

Dated: January 29, 2016

**IT IS SO ORDERED:**

**NO FURTHER EXTENSIONS  
WILL BE GRANTED.**

  
UNITED STATES MAGISTRATE JUDGE

Dated: January 29, 2016